

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JANE SULLIVAN and P. POES 1-75,
individually and on behalf of others similarly
situated,

Plaintiffs,

v.

THE UNIVERSITY OF WASHINGTON, a
Washington public corporation; ELIZA
SAUNDERS, Director of Public Records and
Open Public Meetings at the University of
Washington, in their official capacity,

Defendants.

NO.

**DECLARATION OF P. POE 2
RE: PLAINTIFFS' MOTION FOR
TEMPORARY RESTRAINING
ORDER**

DECLARATION OF P. POE 2

I, P. Poe 2, declare as follows:

1. I am a member of the Institutional Animal Care and Use Committee at the University of Washington. I make this declaration based on my personal knowledge.
2. I have been involved with animal research for a number of years, and I have specialized training and experience in the field of laboratory animal medicine.
3. I believe animals involved in medical research should be treated humanely. I make efforts to ensure that happens both in my professional work and in my work with the IACUC.

1 4. I am requesting to submit this declaration anonymously, and I am supporting this
2 lawsuit, because of my concern that if my identity as an IACUC member were disclosed, I might
3 be harassed or threatened.

4 5. I am familiar through my profession and through my membership in the IACUC
5 that individuals involved in animal research are frequently the subject of harassing and threatening
6 communications from members of the public who oppose animal research.

7 6. I think the IACUC's measures to protect the identity of members are reasonable but
8 not greater than necessary to protect members while still allowing the public to view and review
9 the IACUC's actions.

10 7. I have witnessed harassing comments from members of the public during the public
11 comment portions of IACUC meetings. For example, I have witnessed such members of the public
12 describe veterinarians who support such research as "sadistic."

13 8. During the most recent IACUC meeting on February 17th, 2022, a member of the
14 public who is a frequent speaker at meetings compared the University of Washington to Auschwitz
15 and suggested that members of the IACUC employ the same practices as Nazis.

16 9. Being subjected to personal threats and harassment on the basis of being an IACUC
17 member would make it more difficult for me to participate in the IACUC.

18
19 I declare under penalty of perjury of the laws of the United States that the foregoing is true
20 and correct, and that I executed this declaration on February 22, 2022, at King County, Washington.

21
22 s/ P. Poe 2
23 P. POE 2